



December 5, 2002

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street S.W.,
Washington, D.C. 20554

Re: Comments in response to Sprint and WorldCom's Petition for Limited Reconsideration of Declaratory Ruling (FCC 02-121) released April 22, 2002 in *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CC Docket No. 98-67.

Dear Ms. Dortch:

On behalf of Self Help for Hard of Hearing People (SHHH), the foremost organization representing people with hearing loss, I am submitting comments on Sprint and WorldCom's request for waivers from the Commission's telecommunications relay services minimum standards for internet (IP) relay.

On July 11, 2002. Sprint Corporation, on behalf of the Telecommunications Relay Service operations of its subsidiary Sprint Communications Company L.P., filed a petition requesting that the Commission reconsider the above-referenced Declaratory Ruling in two limited respects. Specifically, Sprint asked that the Commission reverse its decision requiring pay-per-call services, i.e., 900 services, to be provided as part of TRS service via the Internet (IP Relay). In addition, they requested a waiver for the requirement to provide hearing carry over (HCO) functionality.

SHHH is generally in support of the requests for the waiver of these two minimum standards for IP relay. However, we recommend that the waiver be for a limited period of time, one year, to be followed-up at the end of the year with a review of the status of technological development. Our position is based on our finding that neither function is technically feasible at this time.

In the case of pay-per-call services made through IP relay, currently there is no way to pass the calling party's telephone number to the carrier providing the 900 service, and

without such information, the switches of such carrier will reject the call, as there is no way to bill the caller. The number of 900 calls to date made through TRS is small - 10 a month for the entire nation. TRS users can make 900 calls, if they wish, through traditional TRS. SHHH recommends a temporary waiver for IP relay provision of 900 calls for the period of a year, after which the technological feasibility would again be reviewed by the Commission.

For HCO calls, though two-line HCO is possible today, single line HCO is not possible, unless the caller is using DSL or a cable modem. We understand the same technical problem exists for single line HCO as for single line VCO. The Commission already granted a one-year waiver for VCO and 911 calls. SHHH believes a temporary exemption for single line HCO is appropriate in the circumstances. We do not support a permanent exemption. Opportunity must remain for technology to be developed to permit single line HCO through IP relay for people with speech impairments, in the same way that people with hearing loss very much hope for technological developments to allow them to make single line VCO calls through IP relay.

IP relay offers customers who are speech impaired and hard of hearing many benefits. These benefits were well documented by consumers and consumer groups during the Commission's Notice of Proposed Rulemaking on Telecommunications Relay Services and Speech-to-Speech Services CC Docket 98-67. However, the key feature for these populations in using any relay service is the HCO and VCO function. It is, therefore, important to leave open the opportunity for IP relay to include these minimum TRS requirements at some point in the future as technology evolves and makes it feasible. On this basis, SHHH is recommending a one-year waiver period with a follow-up review.

Thank you for the opportunity to submit comments on this proceeding.

Sincerely,



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